

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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MICHAEL LEIDIG and CENTRAL EUROPEAN  
NEWS LTD,

Plaintiffs,

-against-

BUZZFEED, INC.,

Defendant.  
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No: 1:16-cv-00542 (RWS)

ECF Case

**ORAL ARGUMENT REQUESTED**

**NOTICE OF DEFENDANT BUZZFEED, INC.'S MOTION TO COMPEL**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 26 and 37 and upon the accompanying Memorandum of Law and the Declaration of Katherine M. Bolger in Opposition to Plaintiffs' Motion for Partial Summary Judgment and in Support of BuzzFeed Inc.'s Motion to Compel, dated February 16, 2017, and the exhibits annexed thereto, Defendant BuzzFeed, Inc. respectfully moves this Court, before the Honorable Robert W. Sweet, United States District Judge, Southern District of New York, at the United States Courthouse, Courtroom 18C, 500 Pearl Street, New York, New York, 10007, at a date and time as shall be set by the Court, for an order compelling Plaintiffs to comply with their discovery obligations in this case and immediately produce authentic documents responsive to Defendant's First Request for the Production of Documents and Things to Plaintiffs, and for such other and further relief as the Court deems just, necessary and proper.

**PLEASE TAKE FURTHER NOTICE** that opposition papers, if any, shall be served by Plaintiff within fourteen days after service of the motion papers in accordance with Rule 6.1(b)

of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.

Dated: February 16, 2017

Respectfully submitted,

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By: /s/ Katherine M. Bolger  
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